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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RYAN QUARLES,

Plaintiff,

VS.

CIVIL ACTION NO. 21-CV-02813

COMMISSIONER OUTLAW, ET AL.,

Defendants.

REMOTE DEPOSITION BY VIDEOCONFERENCE OF
DETECTIVE GREGORY JARA

TAKEN ON
WEDNESDAY, FEBRUARY 2, 2022
10:14 A.M.

CITY OF PHILADELPHIA LAW DEPARTMENT,
CIVIL RIGHTS UNIT
1515 ARCH STREET, 14TH FLOOR
PHILADELPHIA, PENNSYLVANIA 19102-1595

<p>2</p> <p>1 APPEARANCES VIA VIDEOCONFERENCE</p> <p>2</p> <p>3 APPEARING ON BEHALF OF THE PLAINTIFF RYAN</p> <p>4 QUARLES:</p> <p>5 AARON BELL, ESQUIRE</p> <p>6 AARON BELL LAW FIRM</p> <p>7 7303 Frankford Avenue</p> <p>8 P.O. Box 22024</p> <p>9 Philadelphia, PA 19136</p> <p>10 (215) 609-4888</p> <p>11 (833) 683-1636 (Fax)</p> <p>12 aaronbelllawfirm@gmail.com</p> <p>13</p> <p>14 APPEARING ON BEHALF OF THE DEFENDANTS</p> <p>15 COMMISSIONER</p> <p>16 OUTLAW, ET AL.:</p> <p>17 SHANNON ZABEL, ESQUIRE</p> <p>18 CITY OF PHILADELPHIA LAW DEPARTMENT</p> <p>19 CIVIL RIGHTS UNIT</p> <p>20 1515 Arch Street, 14th Floor</p> <p>21 Philadelphia, PA 19102-1595</p> <p>22 (215) 683-5433</p> <p>23 Shannon.Zabel@phila.gov</p> <p>24</p> <p>25 ALSO PRESENT:</p> <p>26 MARK L. NILSON, MEDIA COORDINATOR</p>	<p>4</p> <p>1 EXHIBITS</p> <p>2 Exhibit Page</p> <p>3</p> <p>4 1 INTERVIEW SHEET 10</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p>3</p> <p>1 INDEX</p> <p>2 Page</p> <p>3</p> <p>4 EXAMINATION BY MR. BELL 5</p> <p>5</p> <p>6 EXAMINATION BY MS. ZABEL 9</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>5</p> <p>1 REMOTE DEPOSITION BY VIDEOCONFERENCE OF</p> <p>2 DETECTIVE GREGORY JARA</p> <p>3 TAKEN ON</p> <p>4 WEDNESDAY, FEBRUARY 2, 2022</p> <p>5 10:14 A.M.</p> <p>6</p> <p>7 STENOGRAPHIC REPORTER: Would counsel</p> <p>8 stipulate to the swearing in of the witness</p> <p>9 remotely?</p> <p>10 MS. ZABEL: Yes.</p> <p>11 MR. BELL: Yes.</p> <p>12 STENOGRAPHIC REPORTER: I'm going to swear</p> <p>13 you in first, Officer Jara -- or Detective Jara.</p> <p>14 Could you please raise your right hand.</p> <p>15 DETECTIVE GREGORY JARA, having been first duly</p> <p>16 sworn, was examined, and testified as follows:</p> <p>17 STENOGRAPHIC REPORTER: Thank you.</p> <p>18 And are there going to be any</p> <p>19 stipulations?</p> <p>20 MS. ZABEL: No.</p> <p>21 MR. BELL: No.</p> <p>22 STENOGRAPHIC REPORTER: No, okay.</p> <p>23 Ready to begin.</p> <p>24 EXAMINATION</p> <p>25 BY MR. BELL:</p>

<p style="text-align: right;">6</p> <p>1 Q Good morning, Detective.</p> <p>2 A Hi. Good morning, Counselor.</p> <p>3 Q I'm not gonna keep you here all day, I</p> <p>4 only have a couple questions for you. If you don't</p> <p>5 understand any of the questions that I ask or if you</p> <p>6 want me to rephrase something, just let me know.</p> <p>7 A Okay, sounds good.</p> <p>8 Q All right. Can you tell me, how were you</p> <p>9 trained to verify a gun license?</p> <p>10 A It's -- there are computer checks that we</p> <p>11 conduct, Counselor. The one that stands out to me</p> <p>12 is what's called a QGLP check.</p> <p>13 Q Okay. Specifically, how do you verify a</p> <p>14 gun license from the State of Georgia, if you know?</p> <p>15 A State of Georgia, outside of -- and I'm</p> <p>16 just speaking like in a hypothetical situation here</p> <p>17 -- outside -- if the computer check comes up</p> <p>18 negative, you can attempt to contact an outside</p> <p>19 agency in Georgia over the phone. Oftentimes, those</p> <p>20 attempts are difficult, depending upon the time of</p> <p>21 day and whatnot.</p> <p>22 Q Okay. Who specifically would you attempt</p> <p>23 to reach in Georgia?</p> <p>24 A Well, any law enforcement agency, you</p> <p>25 know, would be helpful. Off the top of my head, I</p>	<p style="text-align: right;">8</p> <p>1 informed me that he arrested Mr. Quarles for VUFA in</p> <p>2 that he was unable to determine -- he was unable to</p> <p>3 discover a good permit to carry for Mr. Quarles.</p> <p>4 Q Okay. And after Mr. Quarles was arrested,</p> <p>5 then you discovered that the firearm that Mr.</p> <p>6 Quarles had was stolen?</p> <p>7 A That is correct. A check of the firearm</p> <p>8 that it was alleged Mr. Quarles was in possession of</p> <p>9 was in stolen status out of Clayton County, Georgia.</p> <p>10 Q Okay. And just to be clear, and I kind of</p> <p>11 asked you this already, but, okay, the order --</p> <p>12 okay, Mr. Quarles was arrested, right?</p> <p>13 A That's correct. Police Officer Tilghman</p> <p>14 and his partner arrested Mr. Quarles.</p> <p>15 Q Okay. Now, after the arrest, you found</p> <p>16 out that the firearm was stolen, correct?</p> <p>17 A That's correct.</p> <p>18 Q All right. Officer -- Detective, I'm</p> <p>19 almost done with you. Did you have an occasion to</p> <p>20 speak to Mr. Quarles?</p> <p>21 A I -- as I stated, I did not take Mr.</p> <p>22 Quarles's statement.</p> <p>23 Q Okay.</p> <p>24 A Detective Slobodian and Campbell did.</p> <p>25 MR. BELL: All right, Detective, that's</p>
<p style="text-align: right;">7</p> <p>1 can't think of a designated centralized location in</p> <p>2 Georgia. That would be helpful in providing that</p> <p>3 information.</p> <p>4 Q Okay. Do you remember your encounter with</p> <p>5 Mr. Quarles on March 28, 2020?</p> <p>6 A I remember being the assigned investigator</p> <p>7 to that arrest, Counselor. I, myself, did not take</p> <p>8 the post-Miranda statement from Mr. Quarles, that</p> <p>9 was two co-workers of mine, Detective Slobodian and</p> <p>10 Detective Campbell.</p> <p>11 Q All right. But you were involved in --</p> <p>12 you did reach out to Georgia in this case, right?</p> <p>13 A I attempted, from memory, Counselor, I</p> <p>14 attempted via the computer check to confirm Mr.</p> <p>15 Quarles's permit to carry. I could not find any</p> <p>16 documentation via the computer checks of that</p> <p>17 permit.</p> <p>18 Q Okay. You did interview Officer Kevin</p> <p>19 Tilghman?</p> <p>20 A I did conduct that interview.</p> <p>21 Q All right. Officer, when you interviewed</p> <p>22 Detective -- excuse me -- Kevin Tilghman, Officer</p> <p>23 Tilghman, can you tell us what he told you he</p> <p>24 arrested Mr. Quarles for?</p> <p>25 A Well, in summary, Detective Tilghman</p>	<p style="text-align: right;">9</p> <p>1 all I have for you.</p> <p>2 THE WITNESS: Okay, thanks, Counselor.</p> <p>3 MR. BELL: Thank you.</p> <p>4 MS. ZABEL: Detective, I just have a</p> <p>5 couple questions for you.</p> <p>6 THE WITNESS: Sure.</p> <p>7 EXAMINATION</p> <p>8 BY MS. ZABEL:</p> <p>9 Q When you discovered the firearm as stolen,</p> <p>10 can you just describe for us briefly what that</p> <p>11 process is?</p> <p>12 A So the first thing is to, you know, look</p> <p>13 at the firearm and locate the serial number. There</p> <p>14 is a, similar to the gun permit check, there is a</p> <p>15 check to check like the status of the firearm by</p> <p>16 running the serial number in PCIC/NCIC.</p> <p>17 When I queried that serial number, I</p> <p>18 received a stolen status hit, and if I recall</p> <p>19 correctly, the gun was in stolen status out of</p> <p>20 Clayton County, Georgia.</p> <p>21 Q As a detective, when you find that a gun</p> <p>22 is in stolen status, do you make contact with the</p> <p>23 owner of the firearm?</p> <p>24 A Yes, that is protocol, Counselor.</p> <p>25 Q Okay. I'm gonna show you just briefly</p>

<p style="text-align: right;">10</p> <p>1 part of the paperwork here. You'll see it pop up on 2 your screen, hopefully. 3 A Okay. 4 Q (Screen sharing document.) Okay, so I'm 5 showing you what has been marked D0048, this is the 6 Ownership and Non-Permission Interview Sheet. Is 7 this the police paperwork that you filled out 8 relevant to the firearm ownership? 9 (Whereupon, Exhibit 1 was marked for 10 identification.) 11 A Yes, it is. 12 Q Okay. Can you tell me the name of the 13 complainant, please? 14 A The lawful owner of the firearm was a 15 Marquelious McNabb. 16 Q And when you spoke with Mr. McNabb, it 17 looks like some questions were asked -- we're now 18 looking at D49 -- it says, "Does" -- number eight -- 19 "Does the complainant know the defendants?" It 20 says, "No." Can you tell me why you put "no" there? 21 A I asked Mr. McNabb if he knew Mr. Quarles 22 and if Mr. Quarles had permission to be in 23 possession of the firearm, and Mr. McNabb informed 24 me that Mr. Quarles did not have permission to have 25 the firearm.</p>	<p style="text-align: right;">12</p> <p>1 MR. BELL: Same for me. 2 STENOGRAPHIC REPORTER: Okay, sounds 3 great. Thank you. 4 (WHEREUPON, the deposition of DETECTIVE 5 GREGORY JARA was concluded at 10:21 a.m.) 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>
<p style="text-align: right;">11</p> <p>1 Q All right. 2 A And he did not know Mr. Quarles. 3 Q Okay. 4 MS. ZABEL: Those are all the questions 5 that I have for you. Mr. Bell might have some 6 follow-up for you. 7 MR. BELL: I don't have any questions. 8 MS. ZABEL: Okay. Detective Jara -- 9 STENOGRAPHIC REPORTER: I do. 10 MS. ZABEL: Oh, go ahead. 11 STENOGRAPHIC REPORTER: First of all, did 12 both of you need a copy of the transcript? 13 MS. ZABEL: Yes, please. 14 MR. BELL: Yes, please. 15 (Off the record.) 16 STENOGRAPHIC REPORTER: And there was just 17 one more thing, the exhibit that you just showed, 18 are you going to send that to me? Did you need me 19 to attach it to the transcript? 20 MS. ZABEL: Yes, I'll send that to you. 21 STENOGRAPHIC REPORTER: Okay. 22 MS. ZABEL: And for the transcript, can I 23 just get electronic, no printed out version? 24 STENOGRAPHIC REPORTER: Yes. 25 MS. ZABEL: Thank you.</p>	<p style="text-align: right;">13</p> <p>1 CERTIFICATE 2 COMMONWEALTH OF PENNSYLVANIA) 3) ss: 4 COUNTY OF LYCOMING) 5 I, KELLY M. BRADLEY, RPR-Notary Public, authorized to 6 administer oaths within and for the Commonwealth of 7 Pennsylvania and take depositions in the trial of causes, do 8 hereby certify that the foregoing is the testimony of 9 DETECTIVE GREGORY JARA. 10 I further certify that before the taking of said deposition, 11 the witness was duly sworn remotely; that the questions and 12 answers were taken down stenographically by the said KELLY 13 M. BRADLEY, a RPR-Notary Public, approved and agreed to, 14 and 15 afterwards reduced to typewriting under the direction of the 16 said Reporter. 17 I further certify that the proceedings and evidence are 18 contained fully and accurately in the notes taken by me in 19 the within deposition, and that this copy is a correct 20 transcript of the same. 21 In testimony whereof, I have hereunto subscribed by hand 22 this 3RD day of FEBRUARY, 2022. 23 _____ 24 Kelly M. 25 Bradley, RPR, Notary Public In and for the Commonwealth of Pennsylvania My Commission Number 1079773 expires May 17, 2024 - - -</p>

14

1 CORRECTION SHEET

2 Deposition of: Detective Gregory Jara Date: 02/02/22

3 Regarding: Quarles vs. Commissioner Outlaw

4 Reporter: Bradley

5 _____

6 Please make all corrections, changes or clarifications
 7 to your testimony on this sheet, showing page and line
 8 number. If there are no changes, write "none" across
 9 the page. Sign this sheet on the line provided.

10 Page Line Reason for Change

11 _____

12 _____

13 _____

14 _____

15 _____

16 _____

17 _____

18 _____

19 _____

20 _____

21 _____

22 _____

23 _____

24 _____

Signature _____

25 Detective Gregory Jara

15

1 DECLARATION

2 Deposition of: Detective Gregory Jara Date: 02/02/22

3 Regarding: Quarles vs. Commissioner Outlaw

4 Reporter: Bradley

5 _____

6 _____

7 I declare under penalty of perjury the following to
 8 be true:

9 _____

10 I have read my deposition and the same is true and
 11 accurate save and except for any corrections as made
 12 by me on the Correction Page herein.

13 _____

14 Signed at _____, _____

15 on the _____ day of _____, 2022.

16 _____

17 _____

18 _____

19 _____

20 _____

21 _____

22 _____

23 _____

24 _____

Signature _____

25 Detective Gregory Jara

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